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## BACKGROUND STATEMENT

(for possible use on January 7, 1993)

The environmental tobacco smoke ("ETS") risk assessment released today by the Environmental Protection Agency ("EPA") is an example of politically correct science at its worst.

Rather than reviewing the pertinent science with care and objectivity, the report resembles an advocate's brief, with only one side of the case being presented. Even then, moreover, the report makes little effort to alert the reader to the many unsubstantiated assumptions underlying the report's conclusions -- thus conveying a sense of scientific certainty on issues with respect to which the facts are anything but certain.

When all of the pertinent studies are taken into account, the only fair conclusion is that ETS has not been shown to pose a health risk to nonsmokers. If allowed to accumulate to excessive levels, ETS can be, of course, an annoyance -- to smokers and nonsmokers alike. But improved ventilation can solve that problem, just as improved ventilation can be relied upon to reduce or eliminate many other potential indoor air related problems.

We regret that EPA has decided to release its risk assessment on ETS without addressing in a fair and even-handed manner the many objections that have been raised concerning the report's conclusions. Release of the report at this time is particularly ironic in view of the appearance, less than two months ago, of a study by Brownson and coworkers that is directly at odds with the report's conclusions concerning ETS and lung cancer among nonsmokers.

The Brownson study, which was carried out in the United States with funding from the National Cancer Institute, is the largest case-control study of ETS exposure and lung cancer among nonsmokers ever conducted. When the Brownson study is added to the database considered by EPA, there is no longer even a statistically significant relationship between marriage to a smoker and the occurrence of lung cancer among nonsmokers -- which is the exposure scenario that EPA relied upon in addressing the lung cancer issue. Similarly, even without the Brownson study, no relationship has been shown between ETS exposure at work or in social settings and lung cancer among nonsmokers.

EPA's treatment of other health effect issues suffers from comparable deficiencies -- with critical assumptions being made that have not, and often cannot, be verified

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and important studies and other information being ignored. Indeed, the report is precisely the kind of document that was criticized by the Expert Panel, convened by EPA itself, in the report *Safeguarding the Future: Credible Science, Credible Decisions*. After completing a general review of EPA's handling of scientific issues, the Expert Panel concluded in the *Credible Science* report that "EPA science is of uneven quality and the Agency's policies and regulations are frequently perceived as lacking a strong foundation."

It is regrettable indeed that EPA decided to ignore the admonitions contained in the *Credible Science* report in releasing its risk assessment on ETS.

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